

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PUREWICK CORPORATION,)	
)	
Plaintiff/Counterclaim Defendant,)	
)	
v.)	C.A. No. 19-1508-MN
)	
SAGE PRODUCTS, LLC,)	
)	
Defendant/Counterclaim Plaintiff.)	

**[PROPOSED] ORDER PRECLUDING UNTIMELY INVALIDITY OPINIONS OF
DONALD SHELDON AND DIANE NEWMAN**

At Wilmington this ____ day of _____, 2021,

Whereas, the Court has considered the motion of Plaintiff PureWick Corporation to preclude Sage experts Donald Sheldon and Diane Newman from offering invalidity opinions at trial that rely on references or theories that were not timely disclosed pursuant to the Court's Orders;

Now, therefore, it is ordered that:

1. PureWick's Motion is hereby GRANTED.
2. Sage is precluded from offering the opinions of Mr. Sheldon at trial concerning "PureWick Prior Art Devices".
3. Sage is precluded from offering the opinions of Dr. Newman at trial concerning "Omni AMXD and AMXDmax Devices".
4. Sage is precluded from offering the opinions of Dr. Newman at trial concerning the Suzuki reference.

SO ORDERED this _____ day of _____, 2021.

UNITED STATES DISTRICT JUDGE